

Warren Cole
Dana Spicer Manufacturing, Inc.
P.O.Box 750
Fort Wayne, Indiana 46801

Re: 003-11571
First Significant Permit Modification to
Part 70 No.: T 003-7741-00003

Dear William Hoffman:

Dana Spicer Manufacturing, Inc. (formerly known as Dana Corporation, Spicer Axle Division, change implemented in this modification) was issued a permit on October 19, 1999 for an axle manufacturing plant. A letter requesting changes to this permit was received on November 19, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changing descriptive information and the monitoring conditions.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

GS

cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector - Jennifer Dorn
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Dana Spicer Manufacturing, Inc.
2100 West State Boulevard
Fort Wayne, Indiana 46801**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 003-7741-00003	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: October 19, 1999
First Significant Permit Modification 003-11571	Pages Affected: 2, 5-7, 10, 18-19, 26, 32-35, 38-43 Pages Added: 37a-e
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]
- B.27 Enhanced New Source Review [326 IAC 2]

C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]
- C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-200]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-7-6(1)]

- C.9 Performance Testing [326 IAC 3-6]

D.5 FACILITY OPERATION CONDITIONS - Peak Shaving Generator

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.5.1 Prevention of Significant Deterioration (PSD)[326 IAC 2-2)
- D.5.2 Opacity Limitations [326 IAC 5-1-2]
- D.5.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

Compliance Determination Requirements

- D.5.4 Testing Requirements

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.5.5 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.5.6 Record Keeping Requirements
- D.5.7 Reporting Requirements

Quarterly Report

Quarterly Report

Certification Form

Emergency/Deviation Occurrence Report

Natural Gas Fired Boiler Certification

Quarterly Report Form

Quarterly Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates an axle manufacturing plant.

Responsible Official: Warren Cole
Source Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
Mailing Address: P.O. Box 750 Fort Wayne, Indiana 46801
SIC Code: 3714
County Location: Allen
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- 1) One (1) boiler, identified as boiler 3, segment ID 001, fueled by natural gas, using distillate fuel and liquid petroleum gas as back-up fuel, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 1B.
- (2) One (1) boiler, identified as boiler 4, segment ID 002, fueled by natural gas, using distillate fuel and liquid petroleum gas as back-up fuel, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 2B.
- (3) One (1) boiler, identified as boiler 8, segment ID 002, fueled by natural gas, using distillate fuel, liquid petroleum gas as back-up fuel, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B.
- (4) One (1) boiler, identified as boiler 9, segment ID 002, fueled by natural gas, using distillate fuel liquid petroleum gas as back-up fuels, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B.
- (5) Three (3) surface coating booths, identified as Spray 1, Spray 2, and Spray 3, having a maximum throughput of 37 units per hour, coating metal axles, application method is airless, using dry filters as control, and exhausting to stacks 137, 140 and 141 respectively.
- (6) Two (2) tanks, identified as 18 and 19, product stored mineral spirits, each having a height of 18 feet with a diameter of 8 feet, maximum capacity of 6,800 gallons.
- (7) Cleaning process, using mineral spirits, to clean spray guns, and on an as needed basis to clean parts for quality control inspection, stored in a close container, maximum usage is 6,000 gallons per year.
- (8) One (1) portable generator, fueled by number 2 oil, maximum heat input is 2.8 MMBtu per hour.

- (9) One (1) Peak Shaving Generator fired by diesel oil no. 2, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as boilers 6 and 7.

Two (2) boilers, identified as boilers 6 and 7, fueled by natural gas, using #2 fuel oil as back-up fuel, each boiler rated at 6.7 MMBtu per hour, each exhausting to one (1) stack.

- (2) Washing process, with non-VOC, non-HAP cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2][40 CFR 52.21]

- (a) The total source potential to emit of criteria pollutant are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi- Annual Compliance Monitoring Report. Any

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (4) One (1) boiler, identified as boiler 8, segment ID 002, fueled by natural gas, using distillate fuel, liquid petroleum gas as back-up fuel, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B.
- (5) One (1) boiler, identified as boiler 9, segment ID 002, fueled by natural gas, using distillate fuel liquid petroleum gas as back-up fuel, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-3][40CFR 60.40c]

Pursuant to 326 IAC 6-2-3 the particulate matter (PM) from the boilers identified as 8 and 9 shall be limited to:

- (a) 0.1 pounds per MMBtu when using natural gas.
- (b) 0.1 pound per million BTU heat input. Based on a heating value of 140,000 Btu per gallon of oil, the fuel sulfur content of the oil used for fuel shall be limited to 0.5 percent (%) when using distillate fuel.
- (c) 0.1 pounds per MMBtu when using LPG propane fuel.

D.3.2 Opacity limit [40 CFR 60.43c]

The particulate matter emissions shall be limited such that the opacity from the gases exhausted does not exceed 20 % over any 6 minute average, except for one 6 minute period per hour in which opacity shall not exceed 27%.

D.3.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1]

- (a) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):
 - (i) The SO₂ emissions from the 40.2 MMBtu per hour oil-fueled boiler shall not exceed 0.5 pounds per MMBtu heat input; or
 - (ii) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
- (b) Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

Compliance Determination Requirement

D.3.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter and sulfur dioxide limit specified in Condition D shall be determined by a performance test conducted in

accordance with Section C - Performance Testing.

D.3.5 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options when using distillate fuel:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.3.6 Monitoring

- (a) There are no compliance monitoring for this boiler when burning natural gas or LPG propane.
- (b) Annual oil sampling shall be conducted as described in 326 IAC 3-7-4(a). Oil sample preparation and sulfur analyses shall be conducted using ASTM test methods as described in 326 IAC 3-7-4 (a) when using distillate fuel.

The SO₂ emissions shall be monitored pursuant to the requirements of 40 CFR 60.46c.

D.3.7 Visible Emissions Notations

- (a) Daily visible emission notations of the boilers (identified as 8 and 9) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1(b) and D.3.3 the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.3.7, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

- (a) The natural gas boiler certification form will document compliance with condition D.3.1(a) when the boiler is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C - General Reporting Requirements of this permit.
- (b) A summary of the information to document compliance with Condition D.3.1(b), and D.3.3 and shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit upon request when using distillate fuel.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (6) Three (3) surface coating booths, identified as Spray 1, Spray 2 and Spray 3, having a maximum throughput of 37 units per hour, coating metal axles, application method is airless, using dry filters as control, and exhausting to stacks 137, 140, and 141 respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating booth 1, 2, and 3 shall be limited to 3.5 pounds of VOCs per gallon of coating less water. The coatings used are considered extreme performance coatings which are coatings designed for exposure to temperatures consistently above ninety-five degrees Celsius (95° Celsius), detergents, abrasive or scouring agents, solvents, corrosive atmospheres, outdoor weather at all times, or similar environmental condition.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) over spray from this paint booth identified as E-35-1P be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter and volatile organic compound limit specified in Condition D.4.1 and D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

SECTION D.5

FACILITY CONDITIONS

- (10) One (1) Peak Shaving Generator fired by diesel oil no. 2, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.

Emissions Limitation and Standards

D.5.1 Prevention of Significant Deterioration (PSD)[326 IAC 2-2]

- (a) The fuel oil no. 2 usages from the proposed Peak Shaving Generator, and the existing boilers 3, 4, 8, and 9 shall be limited as follows:

Facility ID	Fuel Oil # 2 Usage Limit (kgal/yr)
Boilers 3 & 4 (@ 50 mmBtu/hr)	6,257
Boilers 8 & 9 (@ 40.2 mmBtu/hr)	5,030
Proposed Peak Shaving Generator (6.7 mmBtu/hr)	229.5
TOTAL	11,516.5

The fuel oil no. 2 usage limit shall be based on a twelve- month rolling period.

During the first twelve months of operation of the peak shaving generator, shall be limited such that the total usage (229.5 kgal/yr) divided by the accumulated months of operation (12 months) shall not exceed 19.125 kgal rolled on a monthly basis.

- (c) For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
- (d) For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

Compliance with this condition D.5.1 (a) through (c) will make the source wide emissions below 250 tons per twelve-month, thus keeping the source a minor source for the Prevention of Significant Deterioration (PSD).

D.5.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the opacity from the Peak Shaving Generator stack exhaust #149 shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

D.5.3 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Peak Shaving Generator.

Compliance Determination Requirements

D.5.4 Testing Requirements

Pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements) a one time compliance stack tests shall be performed for the Peak Shaving Generator within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. Compliance stack tests shall be performed, to validate the Alternative Emission Factors (AEF) for NO_x used in the calculation. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements

D.5.5 Visible Emissions Notations

- (a) Daily visible emission notations of the Peak Shaving Generator stack exhaust #149 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

Record Keeping and Reporting Requirements

D.5.6 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, D.5.2 the Permittee shall maintain records in accordance below.

- (1) Fuel oil usage and equivalent Nitrogen oxide (NO_x) emissions;

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.5.2 the Permittee shall maintain records of daily visible emission notations of the Peak Shaving Generator stack exhaust #149.
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and <input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel
From To

I certify under penalty of law that at all times, except as otherwise noted above, only natural gas was burned in the indicated boilers during the report period. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003
Facility: surface coating booths
Parameter: VOC content of coatings
Limit: 3.5 pounds of VOCs per gallon of coating less water

Month: _____ Year: _____

Day	Daily Weighted Average of enamel VOC content			Day	Daily Weighted Average of enamel VOC content		
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

Month	Column 1			Column 2			Column 1 + 2		
	Peak shaving Fuel Oil No. 2 Usage This month	Boilers 3 & 4 Fuel Oil No. 2 Usage This Month	Boilers 8 & 9 Fuel Oil No. 2 Usage This Month	Peak shaving Fuel Oil No. 2 Usage for Past 11 Months	Boilers 3 & 4 Fuel Oil No. 2 Usage for Past 11 Months	Boilers 8 & 9 Fuel Oil No. 2 Usage for Past 11 Months	Peak shaving Fuel Oil No. 2 Usage 12 Month Total	Boilers 3 & 4 Fuel Oil No. 2 Usage 12 Month Total	Boilers 8 & 9 Fuel Oil No. 2 Usage 12 Month Total
Month 1									
Month 2									
Month 3									

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

Month	Fuel Oil No. 2 Usage (Kgal/mo)	Natural Gas Usage (MMCF/mo)	LPG Usage (Kgal/mo)	Fuel Oil No. 2 Equivalent (MMCF/mo)	Total Fuel Oil No. 2 Usage (Kgal/mo)
January					
February					
March					
April					
May					
June					
July					
August					
September					
October					
November					
December					

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

Source Name: Dana Corporation, Spicer Axle Division
Source Location: 2100 West State Blvd., Fort Wayne, IN 46801
County: Allen
SIC Code: 3714
Operation Permit No.: T003-7741-00003
Permit Reviewer: Gurinder Saini

On June 17, 2000, the Office of Air Management (OAM) had a notice published in the Fort Wayne, Journal Gazette, Fort Wayne, Indiana, stating that Dana Corporation, Spicer Axle Division had applied for a Significant Permit Modification to their Part 70 Operating Permit to operate an axle manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 18, 2000, Dana Corporation submitted comments on the proposed significant permit modification to Part 70 permit. The summary of the comments is as follows (with changes shown in bold and strikeout):

Comment #1: The name of the facility should be changed to "Dana Spicer Manufacturing, Inc." as the ownership of the facility has changed and a notice in this regard was submitted to IDEM on February 19, 2000.

Response # 1: IDEM, OAM had received the request for name change. The name of the facility is hereby changed to "Dana Spicer Manufacturing, Inc." . Section A.1, Part 70 Operating Permit Certification, Emergency/Deviation Occurrence Report, Natural Gas Fired Boiler Certification, Quarterly Report and Quarterly Compliance Monitoring Report are modified as follows:

Source Name: ~~Dana Corporation, Spicer Axle Division~~ **Dana Spicer Manufacturing, Inc.**

Comment #2: Condition D.3.6 (b) refers to 326 IAC 3-3-4(a) for oil sampling method which has since been repealed. This should be changed to correct the rule citation.

Response # 2: Condition D.3.6 (b) is modified as follows:

D.3.6 Monitoring

-
- (a) There are no compliance monitoring for this boiler when burning natural gas or LGP propane.
- (b) Annual oil sampling shall be conducted as described in 326 IAC 3-~~37~~-4(a). Oil sample

preparation and sulfur analyses shall be conducted using ASTM test methods as described in 326 IAC 3-37-4 (a) when using distillate fuel.

Comment #3: Permittee had requested to change the Compliance Monitoring report frequency to semi-annually from quarterly. Permit conditions relating to monitoring were modified in the draft permit but these changes were not implemented in the reporting forms. Permittee has requested for modification to Reporting forms to show Semi-Annual Compliance Monitoring Report.

Response # 3: This change has been incorporated in the final version.

Comment #4: Descriptive information with respect to washing process in condition A.3(2) needs to be revised to reflect "non-VOC, non-HAP" cleaner usage.

Response # 4: Section A.3 (2) is modified as follows:

2. Washing process, ~~solvent used mixture of water and on-line~~ **with non-VOC, non-HAP** cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.

On further review IDEM, OAM has observed an error in the Part 70 Operating Permit T003-7741-00003. The Addendum to the Technical Support Document for this permit states that OAM is incorporating CP 003-10367-00003, issued on April 4, 1999 in this Part 70 Operating Permit. This change was erroneously left out in the final version issued to the Permittee.

IDEM, OAM with this modification incorporates a new section D.5 and two reporting forms in the Part 70 Permit as follows:

SECTION D.5

FACILITY CONDITIONS

(10) One (1) Peak Shaving Generator fired by diesel oil no. 2, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.
--

Emissions Limitation and Standards

D.5.1 Prevention of Significant Deterioration (PSD)[326 IAC 2-2)

- (a) **The fuel oil no. 2 usages from the proposed Peak Shaving Generator, and the existing boilers 3, 4, 8, and 9 shall be limited as follows:**

Facility ID	Fuel Oil # 2 Usage Limit (kgal/yr)
Boilers 3 & 4 (@ 50 mmBtu/hr)	6,257
Boilers 8 & 9 (@ 40.2 mmBtu/hr)	5,030
Proposed Peak Shaving Generator (6.7 mmBtu/hr)	229.5
TOTAL	11,516.5

The fuel oil no. 2 usage limit shall be based on a twelve- month rolling period.

During the first twelve months of operation of the peak shaving generator, shall be limited such that the total usage (229.5 kgal/yr) divided by the accumulated months of operation (12 months) shall not exceed 19.125 kgal rolled on a monthly basis.

- (c) For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
- (d) For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

Compliance with this condition D.5.1 (a) through (c) will make the source wide emissions below 250 tons per twelve-month, thus keeping the source a minor source for the Prevention of Significant Deterioration (PSD).

D.5.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the opacity from the Peak Shaving Generator stack exhaust #149 shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

D.5.3 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Peak Shaving Generator.

Compliance Determination Requirements

D.5.4 Testing Requirements

Pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements) a one time compliance stack tests shall be performed for the Peak Shaving Generator within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. Compliance stack tests shall be performed, to validate the Alternative Emission Factors (AEF) for NO_x used in the calculation. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements

D.5.5 Visible Emissions Notations

- (a) Daily visible emission notations of the Peak Shaving Generator stack exhaust #149 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

Record Keeping and Reporting Requirements

D.5.6 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, D.5.2 the Permittee shall maintain records in accordance below.
 - (1) Fuel oil usage and equivalent Nitrogen oxide (NO_x) emissions;

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
- (b) To document compliance with Condition D.5.2 the Permittee shall maintain records of daily visible emission notations of the Peak Shaving Generator stack exhaust #149.
- (c) All records shall be maintained in accordance with Section C - General Record

Keeping Requirements, of this permit.

D.5.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

Quarterly Report

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

Month	Column 1			Column 2			Column 1 + 2		
	Peak shaving Fuel Oil No. 2 Usage This month	Boilers 3 & 4 Fuel Oil No. 2 Usage This Month	Boilers 8 & 9 Fuel Oil No. 2 Usage This Month	Peak shaving Fuel Oil No. 2 Usage for Past 11 Months	Boilers 3 & 4 Fuel Oil No. 2 Usage for Past 11 Months	Boilers 8 & 9 Fuel Oil No. 2 Usage for Past 11 Months	Peak shaving Fuel Oil No. 2 Usage 12 Month Total	Boilers 3 & 4 Fuel Oil No. 2 Usage 12 Month Total	Boilers 8 & 9 Fuel Oil No. 2 Usage 12 Month Total
Month 1									
Month 2									
Month 3									

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

Month	Fuel Oil No. 2 Usage (Kgal/mo)	Natural Gas Usage (MMCF/mo)	LPG Usage (Kgal/mo)	Fuel Oil No. 2 Equivalent (MMCF/mo)	Total Fuel Oil No. 2 Usage (Kgal/mo)
January					
February					
March					
April					
May					
June					
July					
August					
September					
October					
November					
December					

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a Significant Permit
Modification to a Part 70 Operating Permit**

Source Background and Description

Source Name:	Dana Corporation, Spicer Axle Division
Source Location:	2100 West State Blvd., Fort Wayne, IN 46801
County:	Allen
SIC Code:	3714
Operation Permit No.:	T 003-7741-00003
Operation Permit Issuance Date:	October 18, 1999
Significant Permit Modification No.:	T 003-11571-00003
Permit Reviewer:	Gurinder Saini

The Office of Air Management (OAM) has reviewed a modification application from Dana Corporation, Spicer Axle Division relating to the operation of an axle manufacturing plant.

History

On November 19, 1999, Dana Corporation, Spicer Axle Division submitted an application to the OAM requesting to change descriptive information and monitoring conditions at their existing plant. Dana Corporation, Spicer Axle Division was issued a Part 70 permit on December 14, 1998. The permit shall be modified as follows (language deleted is shown with a ~~strikeout~~, language added is shown in **bold**):

1. The Responsible Official should be changed to Warren Cole.

Section A.1 is modified as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates an axle manufacturing plant.

Responsible Official: ~~William Hoffman~~ **Warren Cole**

2. Three surface coating booths do not exhaust to Stack S2. The description to be revised to state that Spray 1 exhausts to Stack 137, Spray 2 exhausts to Stack 140, and Spray 3 exhausts to Stack 141.

Section A.2 (5) and D.4 (6) are modified as follows:

Three (3) surface coating booths, identified as Spray 1, Spray 2, and Spray 3, having a maximum throughput of 37 units per hour, coating metal axles, application method is airless, using dry filters as control, and exhausting to stacks **S2 137, 140 and 141 respectively.**

3. The washing process described in Section A.2 (8) was improved recently to use Non VOC, Non HAP Cleaner. This should be considered as an insignificant activity.

Section A.2 (8) is modified as follows:

~~(8) Washing process, solvent used mixture of water and on-line cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.~~

The succeeding conditions (9) and (10) are renumbered as (8) and (9). This activity is added in Section A.3 (insignificant activities) as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as boilers 6 and 7.

Two (2) boilers, identified as boilers 6 and 7, fueled by natural gas, using #2 fuel oil as back-up fuel, each boiler rated at 6.7 MMBtu per hour, each exhausting to one (1) stack.

- (2) Washing process, solvent used mixture of water and on-line cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.**

4. Section B.28 Creditable Evidence was inappropriately added to this permit during final revisions and must be deleted in entirety.

Section B.28 is modified as follows:

~~**B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]**~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.~~

5. Section C.1 (b) states that "any change or modification which may increase potential to emit to 250 tons per year, from the equipment covered in this permit, shall require a PSD permit.". Permittee has requested that term "shall" be replaced by "may", since a PSD permit is not absolute requirement in such event.

Section C.1 (b) is modified as follows:

~~(b) Any change or modification which may increase potential to emit to 250 tons per year, from the equipment covered in this permit, shall require a PSD permit~~

~~pursuant to 326 IAC 2-2 and 40 CFR 52.21, before such change may occur.~~

6. Section D.3.8 (a) and D.3.9(b) refer to Section D.3.2 incorrectly wherein the correct condition reference for compliance documentation should be section D.3.3 (Sulfur Dioxide)

Section D.3.8 (a) is modified as follows:

D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1(b) and D.3.2 ~~3~~ the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

Section D.3.9 (b) is modified as follows:

- (b) A summary of the information to document compliance with Condition D.3.1(b), and D.3.2 ~~3~~ and shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit upon request.

7. Section D.3.8 (b) incorrectly refers to condition D.3.6. The correct condition reference concerning visible emission notations should be D.3.7.

Section D.3.8 (b) is modified as follows:

- (b) To document compliance with Condition D.3.6 ~~7~~, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.

8. Section D.3.9 (b) should be amended to include the terms "when using distillate fuel at the end of the condition to be consistent with Section D.1.7 (b).

Section D.3.9 (b) is modified as follows:

- (b) A summary of the information to document compliance with Condition D.3.1(b), and D.3.2 ~~3~~ and shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit upon request **when using distillate fuel**.

9. Section D.3.6 (b) requires that PM emission be monitored pursuant to the requirements of 40 CFR 60.47. This code applies to facilities combusting coal, fuel oil or wood. As the boilers 8 and 9 are fired by natural gas and using distillate fuel or liquid petroleum gas as back up fuel, therefore PM monitoring should be deleted from this condition.

Section D.3.6 (b) is modified as follows:

- (b) Annual oil sampling shall be conducted as described in 326 IAC 3-3-4(a). Oil sample preparation and sulfur analyses shall be conducted using ASTM test methods as described in 326 IAC 3-3-4 (a) when using distillate fuel.

The ~~PM and~~ SO₂ emissions shall be monitored pursuant to the requirements of 40 CFR 60.46c ~~and 60.47c, respectively.~~

10. Condition B.11 (c)(5) requires that the annual compliance certification report shall include "[a]ny insignificant activity that has been added without a permit revision". This

requirement has been deleted from the IDEM model permit and from recently issued and proposed Part 70 Permits. Hence, this condition should be deleted from this Permit.

Section B.11 (c) is modified as follows:

~~(5) Any insignificant activity that has been added without a permit revision; and~~

(65) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

11. Condition C.22 (a) requires the source to submit a Quarterly Compliance Monitoring Report. This reporting requirement has been revised to semi-annual frequency in the IDEM Model Permit and recently issued and proposed Part 70 Permits. Permittee requests that this modification be made to their permit as well.

Section C.22 (a) is modified as follows:

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a ~~Quarterly~~ **Semi-Annual** Compliance Monitoring Report. Any deviation from the compliance monitoring requirements and the date(s) of each such deviation must be reported."

Existing Approvals

The source was issued a Part 70 Operating Permit T003-7741-00003 on October 18, 1999.

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12 (d) "Every significant change in existing monitoring Part 70 Permit terms and conditions and every relaxation of reporting and record keeping permit terms or conditions shall be considered significant".

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 19, 1999, Additional information was received on May 15, 2000.

Emission Calculations

No emission calculations were carried out for this modification.

Conclusion

The operation of this axle manufacturing plant shall be subject to the conditions of the attached proposed Significant Permit Modification No. T 003-11571-00003.

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Dana Spicer Manufacturing, Inc.
2100 West State Boulevard
Fort Wayne, Indiana 46801**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 003-7741-00003	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: October 19, 1999
First Significant Permit Modification 003-11571	Pages Affected: 2, 5-7, 10, 18-19, 26, 32-35, 38-43 Pages Added: 37a-e
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]
- B.27 Enhanced New Source Review [326 IAC 2]

C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]
- C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-200]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-7-6(1)]

- C.9 Performance Testing [326 IAC 3-6]

D.5 FACILITY OPERATION CONDITIONS - Peak Shaving Generator

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.5.1 Prevention of Significant Deterioration (PSD)[326 IAC 2-2)
- D.5.2 Opacity Limitations [326 IAC 5-1-2]
- D.5.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

Compliance Determination Requirements

- D.5.4 Testing Requirements

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.5.5 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.5.6 Record Keeping Requirements
- D.5.7 Reporting Requirements

Quarterly Report

Quarterly Report

Certification Form

Emergency/Deviation Occurrence Report

Natural Gas Fired Boiler Certification

Quarterly Report Form

Quarterly Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates an axle manufacturing plant.

Responsible Official: Warren Cole
Source Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
Mailing Address: P.O. Box 750 Fort Wayne, Indiana 46801
SIC Code: 3714
County Location: Allen
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- 1) One (1) boiler, identified as boiler 3, segment ID 001, fueled by natural gas, using distillate fuel and liquid petroleum gas as back-up fuel, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 1B.
- (2) One (1) boiler, identified as boiler 4, segment ID 002, fueled by natural gas, using distillate fuel and liquid petroleum gas as back-up fuel, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 2B.
- (3) One (1) boiler, identified as boiler 8, segment ID 002, fueled by natural gas, using distillate fuel, liquid petroleum gas as back-up fuel, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B.
- (4) One (1) boiler, identified as boiler 9, segment ID 002, fueled by natural gas, using distillate fuel liquid petroleum gas as back-up fuels, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B.
- (5) Three (3) surface coating booths, identified as Spray 1, Spray 2, and Spray 3, having a maximum throughput of 37 units per hour, coating metal axles, application method is airless, using dry filters as control, and exhausting to stacks 137, 140 and 141 respectively.
- (6) Two (2) tanks, identified as 18 and 19, product stored mineral spirits, each having a height of 18 feet with a diameter of 8 feet, maximum capacity of 6,800 gallons.
- (7) Cleaning process, using mineral spirits, to clean spray guns, and on an as needed basis to clean parts for quality control inspection, stored in a close container, maximum usage is 6,000 gallons per year.
- (8) One (1) portable generator, fueled by number 2 oil, maximum heat input is 2.8 MMBtu per hour.

- (9) One (1) Peak Shaving Generator fired by diesel oil no. 2, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as boilers 6 and 7.

Two (2) boilers, identified as boilers 6 and 7, fueled by natural gas, using #2 fuel oil as back-up fuel, each boiler rated at 6.7 MMBtu per hour, each exhausting to one (1) stack.

- (2) Washing process, with non-VOC, non-HAP cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2][40 CFR 52.21]

- (a) The total source potential to emit of criteria pollutant are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi- Annual Compliance Monitoring Report. Any

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (4) One (1) boiler, identified as boiler 8, segment ID 002, fueled by natural gas, using distillate fuel, liquid petroleum gas as back-up fuel, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B.
- (5) One (1) boiler, identified as boiler 9, segment ID 002, fueled by natural gas, using distillate fuel liquid petroleum gas as back-up fuel, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-3][40CFR 60.40c]

Pursuant to 326 IAC 6-2-3 the particulate matter (PM) from the boilers identified as 8 and 9 shall be limited to:

- (a) 0.1 pounds per MMBtu when using natural gas.
- (b) 0.1 pound per million BTU heat input. Based on a heating value of 140,000 Btu per gallon of oil, the fuel sulfur content of the oil used for fuel shall be limited to 0.5 percent (%) when using distillate fuel.
- (c) 0.1 pounds per MMBtu when using LPG propane fuel.

D.3.2 Opacity limit [40 CFR 60.43c]

The particulate matter emissions shall be limited such that the opacity from the gases exhausted does not exceed 20 % over any 6 minute average, except for one 6 minute period per hour in which opacity shall not exceed 27%.

D.3.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1]

- (a) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):
 - (i) The SO₂ emissions from the 40.2 MMBtu per hour oil-fueled boiler shall not exceed 0.5 pounds per MMBtu heat input; or
 - (ii) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
- (b) Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

Compliance Determination Requirement

D.3.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter and sulfur dioxide limit specified in Condition D shall be determined by a performance test conducted in

accordance with Section C - Performance Testing.

D.3.5 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options when using distillate fuel:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.3.6 Monitoring

- (a) There are no compliance monitoring for this boiler when burning natural gas or LPG propane.
- (b) Annual oil sampling shall be conducted as described in 326 IAC 3-7-4(a). Oil sample preparation and sulfur analyses shall be conducted using ASTM test methods as described in 326 IAC 3-7-4 (a) when using distillate fuel.

The SO₂ emissions shall be monitored pursuant to the requirements of 40 CFR 60.46c.

D.3.7 Visible Emissions Notations

- (a) Daily visible emission notations of the boilers (identified as 8 and 9) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1(b) and D.3.3 the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.3.7, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

- (a) The natural gas boiler certification form will document compliance with condition D.3.1(a) when the boiler is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C - General Reporting Requirements of this permit.
- (b) A summary of the information to document compliance with Condition D.3.1(b), and D.3.3 and shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit upon request when using distillate fuel.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (6) Three (3) surface coating booths, identified as Spray 1, Spray 2 and Spray 3, having a maximum throughput of 37 units per hour, coating metal axles, application method is airless, using dry filters as control, and exhausting to stacks 137, 140, and 141 respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating booth 1, 2, and 3 shall be limited to 3.5 pounds of VOCs per gallon of coating less water. The coatings used are considered extreme performance coatings which are coatings designed for exposure to temperatures consistently above ninety-five degrees Celsius (95° Celsius), detergents, abrasive or scouring agents, solvents, corrosive atmospheres, outdoor weather at all times, or similar environmental condition.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) over spray from this paint booth identified as E-35-1P be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter and volatile organic compound limit specified in Condition D.4.1 and D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

SECTION D.5

FACILITY CONDITIONS

- (10) One (1) Peak Shaving Generator fired by diesel oil no. 2, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.

Emissions Limitation and Standards

D.5.1 Prevention of Significant Deterioration (PSD)[326 IAC 2-2]

- (a) The fuel oil no. 2 usages from the proposed Peak Shaving Generator, and the existing boilers 3, 4, 8, and 9 shall be limited as follows:

Facility ID	Fuel Oil # 2 Usage Limit (kgal/yr)
Boilers 3 & 4 (@ 50 mmBtu/hr)	6,257
Boilers 8 & 9 (@ 40.2 mmBtu/hr)	5,030
Proposed Peak Shaving Generator (6.7 mmBtu/hr)	229.5
TOTAL	11,516.5

The fuel oil no. 2 usage limit shall be based on a twelve- month rolling period.

During the first twelve months of operation of the peak shaving generator, shall be limited such that the total usage (229.5 kgal/yr) divided by the accumulated months of operation (12 months) shall not exceed 19.125 kgal rolled on a monthly basis.

- (c) For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
- (d) For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

Compliance with this condition D.5.1 (a) through (c) will make the source wide emissions below 250 tons per twelve-month, thus keeping the source a minor source for the Prevention of Significant Deterioration (PSD).

D.5.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the opacity from the Peak Shaving Generator stack exhaust #149 shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

D.5.3 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Peak Shaving Generator.

Compliance Determination Requirements

D.5.4 Testing Requirements

Pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements) a one time compliance stack tests shall be performed for the Peak Shaving Generator within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. Compliance stack tests shall be performed, to validate the Alternative Emission Factors (AEF) for NO_x used in the calculation. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements

D.5.5 Visible Emissions Notations

- (a) Daily visible emission notations of the Peak Shaving Generator stack exhaust #149 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

Record Keeping and Reporting Requirements

D.5.6 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, D.5.2 the Permittee shall maintain records in accordance below.

- (1) Fuel oil usage and equivalent Nitrogen oxide (NO_x) emissions;

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.5.2 the Permittee shall maintain records of daily visible emission notations of the Peak Shaving Generator stack exhaust #149.
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and <input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel
From To

I certify under penalty of law that at all times, except as otherwise noted above, only natural gas was burned in the indicated boilers during the report period. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003
Facility: surface coating booths
Parameter: VOC content of coatings
Limit: 3.5 pounds of VOCs per gallon of coating less water

Month: _____ Year: _____

Day	Daily Weighted Average of enamel VOC content			Day	Daily Weighted Average of enamel VOC content		
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

Month	Column 1			Column 2			Column 1 + 2		
	Peak shaving Fuel Oil No. 2 Usage This month	Boilers 3 & 4 Fuel Oil No. 2 Usage This Month	Boilers 8 & 9 Fuel Oil No. 2 Usage This Month	Peak shaving Fuel Oil No. 2 Usage for Past 11 Months	Boilers 3 & 4 Fuel Oil No. 2 Usage for Past 11 Months	Boilers 8 & 9 Fuel Oil No. 2 Usage for Past 11 Months	Peak shaving Fuel Oil No. 2 Usage 12 Month Total	Boilers 3 & 4 Fuel Oil No. 2 Usage 12 Month Total	Boilers 8 & 9 Fuel Oil No. 2 Usage 12 Month Total
Month 1									
Month 2									
Month 3									

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

Month	Fuel Oil No. 2 Usage (Kgal/mo)	Natural Gas Usage (MMCF/mo)	LPG Usage (Kgal/mo)	Fuel Oil No. 2 Equivalent (MMCF/mo)	Total Fuel Oil No. 2 Usage (Kgal/mo)
January					
February					
March					
April					
May					
June					
July					
August					
September					
October					
November					
December					

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

Source Name: Dana Corporation, Spicer Axle Division
Source Location: 2100 West State Blvd., Fort Wayne, IN 46801
County: Allen
SIC Code: 3714
Operation Permit No.: T003-7741-00003
Permit Reviewer: Gurinder Saini

On June 17, 2000, the Office of Air Management (OAM) had a notice published in the Fort Wayne, Journal Gazette, Fort Wayne, Indiana, stating that Dana Corporation, Spicer Axle Division had applied for a Significant Permit Modification to their Part 70 Operating Permit to operate an axle manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 18, 2000, Dana Corporation submitted comments on the proposed significant permit modification to Part 70 permit. The summary of the comments is as follows (with changes shown in bold and strikethrough):

Comment #1: The name of the facility should be changed to "Dana Spicer Manufacturing, Inc." as the ownership of the facility has changed and a notice in this regard was submitted to IDEM on February 19, 2000.

Response # 1: IDEM, OAM had received the request for name change. The name of the facility is hereby changed to "Dana Spicer Manufacturing, Inc." . Section A.1, Part 70 Operating Permit Certification, Emergency/Deviation Occurrence Report, Natural Gas Fired Boiler Certification, Quarterly Report and Quarterly Compliance Monitoring Report are modified as follows:

Source Name: ~~Dana Corporation, Spicer Axle Division~~ **Dana Spicer Manufacturing, Inc.**

Comment #2: Condition D.3.6 (b) refers to 326 IAC 3-3-4(a) for oil sampling method which has since been repealed. This should be changed to correct the rule citation.

Response # 2: Condition D.3.6 (b) is modified as follows:

D.3.6 Monitoring

-
- (a) There are no compliance monitoring for this boiler when burning natural gas or LGP propane.
- (b) Annual oil sampling shall be conducted as described in 326 IAC 3-~~37~~-4(a). Oil sample

preparation and sulfur analyses shall be conducted using ASTM test methods as described in 326 IAC 3-37-4 (a) when using distillate fuel.

Comment #3: Permittee had requested to change the Compliance Monitoring report frequency to semi-annually from quarterly. Permit conditions relating to monitoring were modified in the draft permit but these changes were not implemented in the reporting forms. Permittee has requested for modification to Reporting forms to show Semi-Annual Compliance Monitoring Report.

Response # 3: This change has been incorporated in the final version.

Comment #4: Descriptive information with respect to washing process in condition A.3(2) needs to be revised to reflect "non-VOC, non-HAP" cleaner usage.

Response # 4: Section A.3 (2) is modified as follows:

2. Washing process, ~~solvent used mixture of water and on-line~~ **with non-VOC, non-HAP** cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.

On further review IDEM, OAM has observed an error in the Part 70 Operating Permit T003-7741-00003. The Addendum to the Technical Support Document for this permit states that OAM is incorporating CP 003-10367-00003, issued on April 4, 1999 in this Part 70 Operating Permit. This change was erroneously left out in the final version issued to the Permittee.

IDEM, OAM with this modification incorporates a new section D.5 and two reporting forms in the Part 70 Permit as follows:

SECTION D.5

FACILITY CONDITIONS

(10) One (1) Peak Shaving Generator fired by diesel oil no. 2, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.
--

Emissions Limitation and Standards

D.5.1 Prevention of Significant Deterioration (PSD)[326 IAC 2-2)

- (a) The fuel oil no. 2 usages from the proposed Peak Shaving Generator, and the existing boilers 3, 4, 8, and 9 shall be limited as follows:

Facility ID	Fuel Oil # 2 Usage Limit (kgal/yr)
Boilers 3 & 4 (@ 50 mmBtu/hr)	6,257
Boilers 8 & 9 (@ 40.2 mmBtu/hr)	5,030
Proposed Peak Shaving Generator (6.7 mmBtu/hr)	229.5
TOTAL	11,516.5

The fuel oil no. 2 usage limit shall be based on a twelve- month rolling period.

During the first twelve months of operation of the peak shaving generator, shall be limited such that the total usage (229.5 kgal/yr) divided by the accumulated months of operation (12 months) shall not exceed 19.125 kgal rolled on a monthly basis.

- (c) For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
- (d) For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

Compliance with this condition D.5.1 (a) through (c) will make the source wide emissions below 250 tons per twelve-month, thus keeping the source a minor source for the Prevention of Significant Deterioration (PSD).

D.5.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the opacity from the Peak Shaving Generator stack exhaust #149 shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

D.5.3 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Peak Shaving Generator.

Compliance Determination Requirements

D.5.4 Testing Requirements

Pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements) a one time compliance stack tests shall be performed for the Peak Shaving Generator within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. Compliance stack tests shall be performed, to validate the Alternative Emission Factors (AEF) for NO_x used in the calculation. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements

D.5.5 Visible Emissions Notations

- (a) Daily visible emission notations of the Peak Shaving Generator stack exhaust #149 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

Record Keeping and Reporting Requirements

D.5.6 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, D.5.2 the Permittee shall maintain records in accordance below.
 - (1) Fuel oil usage and equivalent Nitrogen oxide (NO_x) emissions;

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
- (b) To document compliance with Condition D.5.2 the Permittee shall maintain records of daily visible emission notations of the Peak Shaving Generator stack exhaust #149.
- (c) All records shall be maintained in accordance with Section C - General Record

Keeping Requirements, of this permit.

D.5.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

Quarterly Report

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

Month	Column 1			Column 2			Column 1 + 2		
	Peak shaving Fuel Oil No. 2 Usage This month	Boilers 3 & 4 Fuel Oil No. 2 Usage This Month	Boilers 8 & 9 Fuel Oil No. 2 Usage This Month	Peak shaving Fuel Oil No. 2 Usage for Past 11 Months	Boilers 3 & 4 Fuel Oil No. 2 Usage for Past 11 Months	Boilers 8 & 9 Fuel Oil No. 2 Usage for Past 11 Months	Peak shaving Fuel Oil No. 2 Usage 12 Month Total	Boilers 3 & 4 Fuel Oil No. 2 Usage 12 Month Total	Boilers 8 & 9 Fuel Oil No. 2 Usage 12 Month Total
Month 1									
Month 2									
Month 3									

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: Dana Spicer Manufacturing, Inc.
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

Month	Fuel Oil No. 2 Usage (Kgal/mo)	Natural Gas Usage (MMCF/mo)	LPG Usage (Kgal/mo)	Fuel Oil No. 2 Equivalent (MMCF/mo)	Total Fuel Oil No. 2 Usage (Kgal/mo)
January					
February					
March					
April					
May					
June					
July					
August					
September					
October					
November					
December					

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a Significant Permit
Modification to a Part 70 Operating Permit**

Source Background and Description

Source Name:	Dana Corporation, Spicer Axle Division
Source Location:	2100 West State Blvd., Fort Wayne, IN 46801
County:	Allen
SIC Code:	3714
Operation Permit No.:	T 003-7741-00003
Operation Permit Issuance Date:	October 18, 1999
Significant Permit Modification No.:	T 003-11571-00003
Permit Reviewer:	Gurinder Saini

The Office of Air Management (OAM) has reviewed a modification application from Dana Corporation, Spicer Axle Division relating to the operation of an axle manufacturing plant.

History

On November 19, 1999, Dana Corporation, Spicer Axle Division submitted an application to the OAM requesting to change descriptive information and monitoring conditions at their existing plant. Dana Corporation, Spicer Axle Division was issued a Part 70 permit on December 14, 1998. The permit shall be modified as follows (language deleted is shown with a ~~strikeout~~, language added is shown in **bold**):

1. The Responsible Official should be changed to Warren Cole.

Section A.1 is modified as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates an axle manufacturing plant.

Responsible Official: ~~William Hoffman~~ **Warren Cole**

2. Three surface coating booths do not exhaust to Stack S2. The description to be revised to state that Spray 1 exhausts to Stack 137, Spray 2 exhausts to Stack 140, and Spray 3 exhausts to Stack 141.

Section A.2 (5) and D.4 (6) are modified as follows:

Three (3) surface coating booths, identified as Spray 1, Spray 2, and Spray 3, having a maximum throughput of 37 units per hour, coating metal axles, application method is airless, using dry filters as control, and exhausting to stacks **S2 137, 140 and 141 respectively.**

3. The washing process described in Section A.2 (8) was improved recently to use Non VOC, Non HAP Cleaner. This should be considered as an insignificant activity.

Section A.2 (8) is modified as follows:

~~(8) Washing process, solvent used mixture of water and on-line cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.~~

The succeeding conditions (9) and (10) are renumbered as (8) and (9). This activity is added in Section A.3 (insignificant activities) as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as boilers 6 and 7.

Two (2) boilers, identified as boilers 6 and 7, fueled by natural gas, using #2 fuel oil as back-up fuel, each boiler rated at 6.7 MMBtu per hour, each exhausting to one (1) stack.

- (2) Washing process, solvent used mixture of water and on-line cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.**

4. Section B.28 Creditable Evidence was inappropriately added to this permit during final revisions and must be deleted in entirety.

Section B.28 is modified as follows:

~~B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.~~

5. Section C.1 (b) states that "any change or modification which may increase potential to emit to 250 tons per year, from the equipment covered in this permit, shall require a PSD permit.". Permittee has requested that term "shall" be replaced by "may", since a PSD permit is not absolute requirement in such event.

Section C.1 (b) is modified as follows:

~~(b) Any change or modification which may increase potential to emit to 250 tons per year, from the equipment covered in this permit, shall require a PSD permit~~

~~pursuant to 326 IAC 2-2 and 40 CFR 52.21, before such change may occur.~~

6. Section D.3.8 (a) and D.3.9(b) refer to Section D.3.2 incorrectly wherein the correct condition reference for compliance documentation should be section D.3.3 (Sulfur Dioxide)

Section D.3.8 (a) is modified as follows:

D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1(b) and D.3.2 ~~3~~ the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

Section D.3.9 (b) is modified as follows:

- (b) A summary of the information to document compliance with Condition D.3.1(b), and D.3.2 ~~3~~ and shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit upon request.

7. Section D.3.8 (b) incorrectly refers to condition D.3.6. The correct condition reference concerning visible emission notations should be D.3.7.

Section D.3.8 (b) is modified as follows:

- (b) To document compliance with Condition D.3.6 ~~7~~, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.

8. Section D.3.9 (b) should be amended to include the terms "when using distillate fuel at the end of the condition to be consistent with Section D.1.7 (b).

Section D.3.9 (b) is modified as follows:

- (b) A summary of the information to document compliance with Condition D.3.1(b), and D.3.2 ~~3~~ and shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit upon request **when using distillate fuel**.

9. Section D.3.6 (b) requires that PM emission be monitored pursuant to the requirements of 40 CFR 60.47. This code applies to facilities combusting coal, fuel oil or wood. As the boilers 8 and 9 are fired by natural gas and using distillate fuel or liquid petroleum gas as back up fuel, therefore PM monitoring should be deleted from this condition.

Section D.3.6 (b) is modified as follows:

- (b) Annual oil sampling shall be conducted as described in 326 IAC 3-3-4(a). Oil sample preparation and sulfur analyses shall be conducted using ASTM test methods as described in 326 IAC 3-3-4 (a) when using distillate fuel.

The ~~PM and~~ SO₂ emissions shall be monitored pursuant to the requirements of 40 CFR 60.46c ~~and 60.47c, respectively.~~

10. Condition B.11 (c)(5) requires that the annual compliance certification report shall include "[a]ny insignificant activity that has been added without a permit revision". This

requirement has been deleted from the IDEM model permit and from recently issued and proposed Part 70 Permits. Hence, this condition should be deleted from this Permit.

Section B.11 (c) is modified as follows:

~~(5) Any insignificant activity that has been added without a permit revision; and~~

(65) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

11. Condition C.22 (a) requires the source to submit a Quarterly Compliance Monitoring Report. This reporting requirement has been revised to semi-annual frequency in the IDEM Model Permit and recently issued and proposed Part 70 Permits. Permittee requests that this modification be made to their permit as well.

Section C.22 (a) is modified as follows:

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a ~~Quarterly~~ **Semi-Annual** Compliance Monitoring Report. Any deviation from the compliance monitoring requirements and the date(s) of each such deviation must be reported."

Existing Approvals

The source was issued a Part 70 Operating Permit T003-7741-00003 on October 18, 1999.

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12 (d) "Every significant change in existing monitoring Part 70 Permit terms and conditions and every relaxation of reporting and record keeping permit terms or conditions shall be considered significant".

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 19, 1999, Additional information was received on May 15, 2000.

Emission Calculations

No emission calculations were carried out for this modification.

Conclusion

The operation of this axle manufacturing plant shall be subject to the conditions of the attached proposed Significant Permit Modification No. T 003-11571-00003.